



Writer Direct: (480) 388-8013

January 22, 2021

VIA ECF

Honorable Daniel J. Steward  
United States Magistrate Judge  
United States District Court  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway, Room 441  
Albany, NY 12207

RE: *CompassCare et. al v. Cuomo, et. al.*  
*Northern District of New York*  
19-cv-1409 (TJM-DJS)

Dear Judge Stewart,

Per this Court's October 22, 2020 scheduling order, the parties file this joint status report. Both parties have served written discovery and document requests upon the other side, and they anticipate completing their responses in the upcoming weeks. Once the parties have had an opportunity to review those answers and document productions, they will determine whether any further discovery is necessary, to include the taking of depositions, before proceeding to brief the remaining claim on summary judgment. The parties have not conducted any settlement negotiations, and do not plan to at this time, as they do not believe this case is amenable to settlement at this time. Should the parties require the Court's involvement to resolve any discovery dispute, they will first seek, in accordance with the scheduling order, to resolve such pursuant to Local Rule 7.1(a)(2). At this juncture the parties do not anticipate needing to alter the current schedule, but will promptly file a motion with the Court in the event it becomes apparent that a modest extension is required.

Respectfully Submitted,

s/Kenneth J. Connelly  
Kenneth J. Connelly  
Sr. Counsel

Honorable Daniel J. Stewart  
January 22, 2021  
Page 2

ALLIANCE DEFENDING FREEDOM  
15100 N. 90th Street  
Scottsdale, AZ 85260  
(480) 444-0020  
Email: [kconnelly@adflegal.org](mailto:kconnelly@adflegal.org)

*Counsel for Plaintiffs*

cc (via ECF): Adrienne J. Kerwin